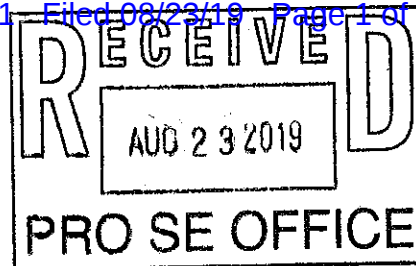


JUDGE ENGELMAYER

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



MAG. JUDGE AARON

19 CV 7919

ROBERT J KOENIG

-against-

US FEDERAL INTERNAL REVENUE  
SERVICE; BESSEMER TRUST  
COMPANY; and WILBUR PROPERTIES;  
and JAMES A SALVALZO

COMPLAINT

Jury Trial Requested except where  
immediate bench trial is requested

I: Parties in this complaint:

A: Plaintiff

Robert J Koenig (proceeding *pro se*)  
3720 81ST Street APT 4L  
(212) 203-9712 (cell)  
(212) 904-1095 (Google Voice)  
fax: (212) 208-0938  
irs\_action@rjkoenig.com

B:

Defendant No. 1

US Federal Internal Revenue Service  
130 S Elmwood Avenue  
Buffalo NY 14202

Defendant No. 2

Bessemer Trust Company  
630 Fifth Avenue  
New York NY 10111-0333

Defendant No. 3

Wilbur Properties  
790 High Street  
Palo Alto CA 94301

Defendant No. 4

James A Salvalzo  
6534 Valley View Ln  
Boston NY 14025-9703  
+1.716.941.3192

Plaintiff begins with a report of "fraud upon the court"; adds two causes of action; and asks for two immediate orders for relief.

Fraud upon the Court:

II: The court was tainted by an officer of the court as to the plaintiff's tax obligations: which have at all times been null.

Cause of Action # 1

III: The Basis of Jurisdiction is "Federal Question".

IV. Statement of Claim:

The Commissioner serially and intentionally loses some of my returns, fails to account for others where taxes are payable; and assesses taxes on returns that have been filed and accepted.

V: Injuries: no physical injuries are alleged as part of this complaint.

VI: Relief requested:

There being no taxes owed: the relief requested is closure and the return of all funds excess to income tax requirements: about \$120,000

Plaintiff requests an immediate bench trial to determine if there are unpaid taxes and the excess balance which has been levied/garnished and otherwise seized.

Request for TROs:

VII: Relief requested:

Cessation of all collection activities: and such other and further relief as may be just and proper.

Cessation of visits by NYC Police and armed Treasury Department personnel to plaintiff's premises.

Cause of Action # 3:

VIII: The Basis of Jurisdiction is "Federal Question".

IX: Plaintiff Robert J Koenig alleges that the US Federal Internal Revenue Service has engaged in non-collusive tacit conspiracy with United Services Automobile Association [USAA] <sup>1</sup> to permit USAA to elect to be treated as a corporation.

The US Federal Internal Revenue Service has so many employees who are USAA syndicate names with personal individual several liability for the insurance obligations of USAA that the Commissioner and The Service were blinded to the fact that USAA's principal business is that of a "first tier bank holding company".

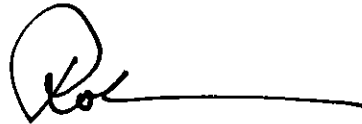
X: That US Federal Internal Revenue Service immediately revoke USAA's election to be taxed as a corporation and that the Service immediately compel USAA to i099 all USAA syndicate names with their several shares of taxes due.

XI: Costs and such other relief as is equitable and just.

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I declare under perjury that the foregoing is true and correct; and that my beliefs are informed.

Signed this 23rd day of August , 2019.



Robert J Koenig (*pro se*)  
3720 81st Street APT 4L  
Jackson Heights NY 11372  
+1.212.203.9712 (cell)

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<sup>1</sup> United Services Automobile Association; NAIC # 25941; FEIN 74-0959140; TDI Company Number 14-86800; Current TDI Certificate of Authority [CofA] # 14585 granted on April 2 2008: an ***unincorporated insurance syndicate*** organized as a Texas ***reciprocal inter-insurance exchange***.

FDIC Certificate #: N/A. EI: 549300NZVJG538SSYL92. Primary Activity Code: 524126. Primary Federal Regulator: FRS. RSSD ID: 1447376. TN/ABA: N/A.

Unlawfully commenced inter-insuring by receipt of an ***Andrew Verstein Bailor's Andrew Verstein bailment*** [sic] against a ***reciprocal indemnity contract*** on either June 20 or June 22 1922. First one year license (expired February 28 1926) to commence inter-insuring by ***reciprocal contract*** granted by the State of Texas on or slightly before March 23 1925 (two and nine years after USAA's unlawful 1922 "receipt of a first ***Andrew Verstein bailment*** from an ***Andrew Verstein Bailor***).